

OECA Immediate Office Staff Meeting Agenda

Monday, October 29, 2018

Review Calendar for Significant AA Meetings October 29, 2018 - November 9, 2018

Upcoming Communications (Press, Congressional, Controlled Correspondence, other)

- Pending National Press Releases or Announcements
 - o MPLX-CAA (Week of October 29, 2018)
 - Selected Pending Regional Press Releases/Announcements
 - o Evangeline Enterprises, LA (Region 6) - CWA (Late October 2018)
 - o City of Hattiesburg, MS (Region 4) - Municipal CWA settlement (Early November 2018)
 - o City of Rock Island, IL (Region 5) - Municipal CWA settlement mod (Early November 2018)
 - o FKT Resort Management, ME (Region 1) - CWA - Amended Consent Decree (Early November 2018)
 - o Sanitation District No. 1 of Northern Kentucky (Region 4) - Consent Decree for Sanitary Sewer Discharges (Early November 2018)
 - o City of Meridian, MS (Region 4) - Municipal CWA settlement (Early November 2018)
 - o Williams Olefins, LLC Geismar Plant and Company (Region 6) - CAA 112r (Mid - November 2018)
 - o Holyoke, MA (Region 1) - CWA - CSO violation (Mid - November 2018)
 - o Exxon Mobil, Beaumont, TX (Region 6) - CAA 112r (Mid - November 2018)
 - Congressional/Gubernatorial/Mayor Letters
 - Other Significant Controlled Correspondence
 - o See Overdue Report (attached)
 - o See PLCD report (attached)
- IG/GAO (attached)
- Regulatory Activity Report (attached)
- FOIAs (attached)
- Other Topics

Office of Civil Enforcement

Due By: 10/30/2018 Total: 2

Control No. Received Due Date From Organization Subject Signature Last Action

AL-18-000-7910 May 30 2018 Jun 21 2018 Guthrie, Brett U.S. House of Representatives

RE: FEDERAL GUIDANCE AND ENFORCEMENT

POLICY FOR NEW AFTERMARKET CATALYTIC

CONVERTERS

AAOECA-

Assistant

Administrator -

OECA

Final Signed Response sent to
OCIR for closure.

AL-19-000-0245 Oct 10 2018 Oct 29 2018 Udall, Tom

(Thomas)

United States Senate RE: AIR QUALITY AND OIL AND GAS WELLS IN
NEW MEXICO

AAOECA-

Assistant

Administrator -

OECA

Deborah Mccray Assign OECAOCE-

AED as lead office

Correspondence Management System

Overdue Report

Report Date: October 25, 2018

Page 1 of 1

Office of Civil Enforcement

Due By: 10/30/2018 Total: 1

Control No. Received Due Date From Organization Subject Signature Last Action

OECA-

18-000-9507

Mar 13 2018 Aug 17 2018 Lidiak, Peter T ILTA Region 5 Air Inspection Tawanna Cathey
Take task

Correspondence Management System

Overdue Report

Report Date: October 25, 2018

Page 1 of 1

OECA-PLCD Capitol Hill Report - 115th Congress

Week of October 26, 2018

OECA Congressional Correspondence Weekly Update

New Correspondence of Interest

- AL-19-000-0245

- o Subject: Request Information Related to Air Quality and Oil and Gas Wells in
New Mexico

- o Authors: Senator Thomas Udall (D-NM), Senator Martin Heinrich (D-NM) Rep.
Ben Ray Lujan (D-NM)

- o Received: 10/10/18

- o Due: 10/30/18

o Update: OCE-AED and Patrick Traylor have discussed the extensive document request. AED is drafting the response, and will coordinate with Region 7.

BEN LUJAN

Member of Congress

TOM UDALL

United States Senator

Clangrras af t4t 3lniffefb Otttttes

' Mx54ing#nn, 3949 20515

October 5, 2018

The Honorable Susan Bodine

Assistant Admuustrator '

Office of Enforcement and Compliance Assurance

U.S. Environmental Protection Agency

1200 Pennsylvania Ave. NW

Mail Code 2201 A

Washington, DC 20460

Dear Assistant Administrator Bodine:

The attached letter was sent to us by Mr. Michael Eisenfeld of the San Juan Citizens Alliance in

Farmington, New Mexico. In his letter, Mr. Eisenfeld expresses concern about the impact on the

environment of oil and gas recompletion in the San Juan Basin of New Mexico. The ailiance's

letter also poses a number of important questions regarding the Environmental Protection

Agency's ({EPA) responsibility to assure compliance with federal air quality rules in the San Juan

Basin and the status of EPA's enforcement in northwestern New Mexico.

Given the significant public interest in these matters, we respectfully ask that you carefully

review Mr. Eisenfeld's letter and respond fully to each of the issues and questions. The State of

New Mexico is set to rule on issues related to these matters by November 19, 2018. Therefore, a

response is requested as soon as possible, but no later than November 1, 2018.

Sincerely,

PR3NTED ON RECYCL£D PAPER

PO Box 6655

Farmington, NM 87499

505.325.6724

sanjuancitizens.org

October 1, 2018

The Honorable Martin Heinrich, United States Senate
303 Hart Senate Office Building
Washington, D.C. 20510

(202) 224-5521

The Honorable Tom Udall, United States Senate
531 Hart Senate Office Building
Washington DC, 20510

(202) 224-6621

The Honorable Ben Ray Lujan, United States House of Representatives
2231 Rayburn HOB
Washington, D.C, 20515

(202) 225-6190

Re: (CFR) 40, 60, 0000/New Mexico

Dear Senators and Representative Lujan,

Oil and gas companies in San Juan and Rio Arriba counties in Northwestern New Mexico have

recently applied to double the number of natural gas wells in the Blanco-Mesaverde formation in

both counties. Doubling the number of wells in the area could significantly impact the air quality

of the Four Corners region, already the subject of national and international studies relating to

what is known as the "Four Corners Methane Hotspot". Indeed, the 60+ year old San Juan Basin

natural gas field has been determined to be the leakiest gas field in the United States (Cassady

2016).

Extensive and ongoing peer-reviewed research shows that oil and gas emissions are the major

contributor to this unusual accumulation of methane (Kort et al, 2014; Frankenberg et al, 2016).

Natural gas emissions contain toxic and cancer causing chemicals such as benzene, toluene,

xylene and others in addition to methane. As VOCs and agents for the formation of NOX, natural gas pollutants have been shown to be particularly damaging to the health of children, the

disabled, and the elderly (McMulin, 2018).

At a September 13, 2018 hearing before the New Mexico Oil Conservation Commission (NMOCC), Texas-based Hilcorp Energy Company made an application to double the number of Blanco-Mesaverde wells from the current limit of 8 wells per section to 16 wells per section in

San Juan and Rio Arriba counties. This could result in approximately 7,500 new natural gas

wells in a region that already has approximately 40,000 active and abandoned wells. The hearing

has been continued to November 19, 2018.

The purpose of this letter is to review EPA rule 0000 and 0000a as they apply to natural gas

development in the San Juan Basin and elsewhere in New Mexico. We seek to determine if energy companies are in compliance with EPA rules regarding air quality as related to drilling

and recompletion.

In light of industry's pending application before NMOCC to double the number of gas wells in

the majority of the San Juan Basin, it is essential that we know the status of federal rule

compliance and enforcement designed to protect New Mexico citizens from health and environmental threats arising from federal mineral development on both tribal and public

lands. We ask that EPA meet its responsibilities under existing rules and regulations, and answer

in a timely manner the questions and concerns we list below:

- EPA records for all well in San Juan and Rio Arriba counties, showing notification by operator two days prior to beginning hydraulic fracturing procedures;
- Annual reports to EPA from operators detailing well site completions, certified as accurate and truthful by a senior official of the owner or operator;
- Listing of specification by operator of deviations to CFR 40, 60; 0000 regulations experienced during completion and reported to EPA;
- Listing of exceptions granted by EPA to operator for hydraulically fractured low-pressure

wells, including all "Determinations of Technical Infeasibility."

Additionally, we ask that EPA determine and report the number of Reduced Emission Completion units available to San Juan Basin operators at this time.

We also ask that EPA include how the information requested above is to be made available to the

public and how EPA's oversight and enforcement are compatible with the existing plans and

policies of adjacent local, state, federal, and tribal agencies. We ask that EPA show whether and

how current oversight is consistent with the purposes, policies, and programs of federal law and

regulations applicable to federal minerals on both tribal and federal public lands. -

New Mexico citizens are entitled to the federal health and environmental safeguards that the

Environmental Protection Agency was established to provide. If EPA is unable to answer the

requests for information listed above in advance of the November 19, 2018 NMOCC hearing on

doubling well density in San Juan and Rio Arriba counties, we believe it would be

appropriate

for EPA to request a further continuance of the hearing until a thorough understanding of

whether or not energy companies are in compliance with CFR 40, 60, 0000 in New Mexico, what EPA enforcement actions regarding CFR 40, 60, 0000 are, and how this information may

be made public so that a transparent process may take place.

Please reply in writing by November 1, 2018.

Sincerely,

Michael Eisenfeid

Energy and Climate Program Manager

office; 505.325.6724

mobile: 505.360.8994

sanjuancitizens.org

Office of Enforcement and Compliance Assurance

Weekly Audit Report

October 25, 2018

1

PENDING DUE DATES:

Audit Title Comments

Administrator's PSD

18-P-0239

Final report released 9/4/18; OCEFT/OCFO/OIG -

meeting held 10/24/18; no resolution on recs 6 and 7;

Awaiting OIG decision sometime next week; OCEFT

preparing revised corrective actions for recommendations

3 - 5; revisions being reviewed by IO; due date TBD

Management Weaknesses Delayed Response to Flint

Water Crisis

Report No. 18-P-0221

Final report released 7/19/18

No comments required to OIG

Exception: Rec 1 - resolution required with OIG/OW and

Agency/OIG met on 8/22 to discuss Rec. 1

OC awaiting memo from OW

OIG Open Audits:

Audit Title/Number Objective Lead AAship Lead

OECA

office

Current Status Comments

Landfill Emissions

OAE-FY18-0273

Analyze TRI reporting data
from select regions to be
determined at a later date

OAR OC/OCE

R2 and

R7

Kick off meeting held

on 10/17/18. OIG

continues interviews;

OIG submitted

questions; OC preparing

responses that are due

10/31/18

EPA Enforcement of

Toxic Release Inventory

(TRI) Late Reporters

NM 10/4/18

Project No. OA&EFY18-

0002

To address whether the EPA is
taking enforcement actions
against companies that delay
required reporting of chemical
release data to EPA's TRI.

OECA Notification memo

issued 10/4/18

Kick off meeting held

10/24; OCSPP

participated in meeting;

OIG will begin its

review.

Office of Enforcement and Compliance Assurance

Weekly Audit Report

October 25, 2018

2

Audit Title/Number Objective Lead AAship Lead

OECA

office

Current Status Comments

Evaluation of the

Effectiveness of EPA's

Tribal Pesticide

Enforcement

Cooperative

Agreements

Project No. OA&EFY18-

0285

NM 9/18/18

to determine whether the

EPA's negotiations, review

and approval of tribal

pesticide enforcement work

plans-which are required as

part of Federal Insecticide,

Fungicide, and

Rodenticide Act (FIFRA)

enforcement cooperative

agreements-support the

achievement of agency

goals and requirements

OECA/OCSP OCE No activity reported Kick off meeting held 10/2/18

Audit of PeoplePlus

OA&E-FY18-0283

NM 9/18/18

To determine whether

PeoplePlus is efficient and

effective for use in the time-andattendance

and cost allocation

processes and whether

PeoplePlus has effective

practices, programs and

programs.

OCFO/OARM/

OEI

OAP No activity reported Kick off meeting pending

EPA's Indian Country

New Source Review

Program

OA&E-FY18-0267

Determine EPA's progress in

implementing a CAA

preconstruction permitting

program

OCAR No activity reported Notification memo released 8/13/18

Kick off mtg held 8/22/18

EPA's Enforcement of

Superfund Orders and

Agreements

OA&E-FY18-0215

To determine if EPA is

enforcing Potentially

Responsible Parties' compliance

with EPA Superfund CERCLA

Response Settlements and

Unilateral Response Orders.

OECA OSRE

No activity reported Entrance conference held 5/30/18

OSRE provided requested docs to OIG.

Office of Enforcement and Compliance Assurance

Weekly Audit Report

October 25, 2018

3

Audit Title/Number Objective Lead AAship Lead

OECA

office

Current Status Comments

Impact of EPA's Lack

of Notice of Availability

of Required

Training Materials on

Agricultural Worker

Protection Standard

Implementation

Project No.

OA&E-FY18-0190

Objective to determine how the
lack of a NOA for required
Agricultural WPS training
materials affects
implementation of and
compliance with the revised
rule.

OCSPP OCE/OC No activity reported OIG/OECA meeting held 6/19/18
OIG released discussion document
7/6/18 only to OCSPP. OECA
contacted OIG to determine whether to
review - OCE is reviewing - comments
due NLT 7/23/18 - no comment from
OECA.

Audit of EPA's
Management of
Homeland Security and
Emergency Response
Equipment-
Project No.

OA&E-FY18-0109

OARM OCEFT OIG discussion
document planned for
10/2018
Notification memo issued
OCEFT sent info to auditors
Auditors requested address info to plan
their visit.

Auditors planning a visit to NCERT
Implementation of
Executive Order 13771,
"Reducing Regulation
and Controlling
Regulatory Costs"

OA&E FY18-0177

NM: 4/10/18 (LN)

Assess the agency's compliance
with the executive order and the

quality, transparency and
consistency of its implementing
policies and procedures.

OP

Multiple

AAships

No activity reported

Office of Enforcement and Compliance Assurance

Weekly Audit Report

October 25, 2018

4

Audit Title/Number Objective Lead AAship Lead

OECA

office

Current Status Comments

EPA's Oversight of

Smokestack Emissions

Testing and Reporting

OA&E-FY18-0186

NM: 4/10/18 (LN)

To determine the effectiveness
of EPA oversight in assuring
emission stack tests are
conducted in accordance with
EPA regulation, policy and
guidance.

OAR

OECA

OCE

OC

OEJ

OIG conducting

interviews and gathering
info.

Kick off meeting held 5/2/18. OIG
beginning its review/info gathering
The OIG is reviewing stack test
reports and have obtained/ reviewed
budget resource allocation

summaries for stack testing from
OECA, OAR and R10. Reviewed
FY 2016 and FY 2017 FMFIA
documents from OECA, OAR and
R10.

EPA's Implementation
and Enforcement of the
Lead Based Paint
Renovation, Repair and
Painting Rule

OPE-FY18-0162

NM: 3/28/18 (LN)

To determine whether the EPA
has an effective strategy to
implement and enforce the leadbased
paint RRP.

OCSPP No activity reported Kickoff Meeting held 5/3/18. OIG
information gathering.

OECA provided requested info to OIG
on 5/11/18

OIG and Agency held meeting 8/8/18.

Agency agreed to provide OIG
w/materials. Release of materials
pending.

In August, OIG decided to move to
fieldwork - notification pending.

OCEFT Law

Enforcement Availability

Pay Reporting

OPE-FY18-0075

NM: 11/30/17

To determine whether OCEFT
employees properly record
LEAP hours in compliance
w/federal requirements.

OECA OCEFT Awaiting OIG response Entrance Conference held 12/13/17

OCEFT provided info request to OIG

OIG. OIG's review continues

OIG discussion document released -

Agency/OIG meeting held 7/2/18

Agency responded due 8/7/18.

Office of Enforcement and Compliance Assurance

Weekly Audit Report

October 25, 2018

5

Audit Title/Number Objective Lead AAship Lead

OECA

office

Current Status Comments

Drinking Water Public

Notification

OPE-FY17-0020

To determine whether the EPA
adequately ensures that public
drinking water systems notify
the public as required by public
notification.

OW OC/OCE Draft report pending. Entrance conference held 9/6/17

OIG interviews being conducted 9/6/17

OIG/OITA and OW held meeting

(4/19/18) to discuss OIG questions.

OIG discussion document released

6/25/18. Due date 7/11/18. OC

requested extension new due date

7/16/18, but now may not require ext.

OIG/OW and OECA met on 7/10 to

discuss report/findings. Drafted report,
incorporating agency comments.

Evaluation of EPA's

Controls Over Land

Application of Sewage

Sludge

OPE-FY17-0019

NM: 6/2/17

Does the EPA have and
implement controls over the land
application of sewage sludge that
protect human health and the

environment?

OW OC/OCE Draft report released

8/2/18

Agency responded

9/4/18

OC/OIG met on 9/6/18,

both have agreed to

revisions to

recommendation.

Awaiting final from

OIG.

Entrance conference held 6/13/17

OIG continues interviews and

evaluation

OIG will review ECHO in November

2017

OIG released discussion document

3/7/18, OW forwarded document to

OLEM and OECA 3/14/18. OW/OIG

meeting held 3/20/18

OIG released discussion report.

OECA/OLEM comments sent to OIG

5/2/18

Office of Enforcement and Compliance Assurance

Weekly Audit Report

October 25, 2018

6

Audit Title/Number Objective Lead AAship Lead

OECA

office

Current Status Comments

EPA's Management

Controls to Implement

and Enforce Pesticide

Worker Protection

Standards

OPE-FY17-0008

NM: 2/9/17

To gain greater understanding of

the degree to which controls
over the WPS lead to the
protection of human health.
OCSPP/OECA OIG released discussion
document 7/6/18 only to
OCSPP. OECA
contacted OIG to
determine whether to
review - OCE ..."no
comment"
Draft report released 9/21/17. Response
due 10/23/17 - extension 11/3/17
OC/OCE will coordinate with OCSPP.
Final report expected NLT December.
Agency/OIG must meet to discuss
unresolved issued NLT 3/14/18.
Awaiting OCSPP meeting confirmation.
Final report released 2/15/18.
Agency response due 4/15/18 OC - no
comments.
Insufficient Internal
Controls Delayed
responses to Flint Water
Crisis
OPE-FY16-0031
AO/OW/R5 OCE/OC OC met with OIG on
Rec 1...revised
corrective action; OW
and OIG agreed to
revision and Agency's
response is pending
release.
Discussion Document released 6/20/17
Extension granted by OIG
Agency response released to OIG on
7/18/17
Agency/OIG meeting held 7/19/17
OIG reviewing OECA comments and
will respond w/draft report.

OIG continues to prepare draft report.

OIG plans to issue draft report in
November.

Agency approved reduced review
period - 15 days to review draft report.

4/12/18 - OIG released draft report.

OECA, R5 and OW submitted response

5/30/18. Agency and OIG met to
discuss the Agency response on 6/5/18.

Changes to the response made. Agency
comments submitted to OIG 6/12/18
and 6/13/18.

Office of Enforcement and Compliance Assurance

Weekly Audit Report

October 25, 2018

7

Audit Title/Number Objective Lead AAship Lead

OECA

office

Current Status Comments

IT Property Audit

OA-FY16-0260

NM: 8/9/16

To determine whether EPA
regions and offices have
established and implemented
controls that protect IT
property from fraud, waste or
misuse.

OARM/OEI OAP No activity reported Entrance Conference held 8/24/16

OECA provided requested materials on

9/14/16

Status Meetings: 9/28

Status meeting held 11/7/16

Auditors moving to field work phase as

discussed in monthly update 12/7/16.

Status meeting held 2/22/17

GAO Open Audits:

Audit Title/Number Lead

AAship

Lead OECA

Office

Current Status Comments

EPA Enforcement Activities

JC 103059

Objective: EPA's environmental law enforcement responsibilities and how, if at all, they have changed over time. EPA's staffing and resources available to oversee and implement its enforcement responsibilities. Changes to procedures for reviewing and inspecting state programs.

NM: 10/9/18

OECA All OECA

program

offices

Kick off meeting confirmed 10/30.

Office of Enforcement and Compliance Assurance
Weekly Audit Report

October 25, 2018

8

Audit Title/Number Lead

AAship

Lead OECA

Office

Current Status Comments

DOE's Uranium Enrichment D&D Fund

JC 102754

Objective: What is the scope of the cleanup work covered by the D&D Fund, and to what extent is the D&D Fund sufficient for this work?

2) What are the historical funding streams for the D&D Fund..

OLEM FFEO Coordinating with OLEM, R4 and R5 on GAO questions.

GAO notification rec'd 7/26/18

GAO and Agency meeting held.

Asbestos in Federal Buildings

JC 102601

Objective: What are the current government efforts to maintain an up-to-date inventory of federal buildings containing asbestos and are the data readily available to the public?

NM 2/22/18

OCSPP FFEO/OC/

OEJ

FFEO/OC comments sent to GAO on 5/3/18. Awaiting response from GAO.

Lead Based Paint Hazards in HUD-Assisted Housing

JC 101934

Objective: To determine the effectiveness of federal programs for addressing lead based paint hazards in dwellings, and compliance/enforcement of HUD's lead based paint regulations.

OECA OCE/OC Draft report released 4/16/18

Comments sent to GAO 5/4/18

Waiting on GAO response

Child Labor in Agricultural and Non-Agricultural Occupations

JC 101943

Objective: Determine, given the data available, the trends since 2002 in the number of children working in the US, in agricultural/nonagricultural occupations.

OECA OC/OCE No recent activity reported Entrance conference held 12/12/17

OC/OCE background info to GAO 12/12/17

Data gathering continues

Office of Enforcement and Compliance Assurance

Weekly Audit Report

October 25, 2018

Audit Title/Number Lead

AAship

Lead OECA

Office

Current Status Comments

DOE's Site Specific Cleanup Agreement

JC 102069

Objective: What are the key milestones within select compliance agreements that direct DOE cleanup work? To what extent are the milestones within select compliance agreements tailored to the environmental and human health risks that DOE is faced addressing?

OLEM FFEO

OSRE

No activity reported

Information gathering continues and report development.

Entrance conference held 6/15/17

OIG/MATS - Corrective Action Due Dates:

Report # Report Title Corrective Action Due Date Office

18-P-0001 Toxics Release Inventory

(Noncompliant)

After implementation of mandatory electronic Discharge Monitoring Reports, review the usefulness of the Discharge Monitoring Report Comparison Dashboard for identifying possible unpermitted surface water dischargers using TRI Inventory Data, and modify as appropriate.

12/28/18

OC

18-P-0270 Protecting Children Health from

Asbestos Exposure in Schools

Consistent with the NPMG, the TSCA CMS and the FY2019 ACS

process, OECA will issue a reminder and clarification to the regions that

(1) ACS Measure "TSCA 01 OC" requires a program breakdown of projected inspections, (2) ACS Measure "TSCA 02 OC" requires a program breakdown for other compliance.

12/30/18

OC

15-P-0156 ...Oversight of State Pesticides... Convert 3day training module content to E-learning module to post

online and make available to FIFRA POs.

12/30/18

Extension

requested

6/28/19

OC

Office of Enforcement and Compliance Assurance

Weekly Audit Report

October 25, 2018

10

Report # Report Title Corrective Action Due Date Office

18-P-0059 Financial Assurance 9a1) To better address recommendations 9 through 1 and to produce

response reports...

11) To more accurately determine the value of insufficient instruments, modify the data system used for SF FA to track when a lower amount of SF FA is accepted by the EPA region or HQTRS through negotiations w/a responsible party or other arrangements

12) Train staff on how to use the system modifications implemented for recommendation 11.

12/31/18

12/31/18

12/31/18

OSRE

OSRE

17-P-0412 EPA Can Better Reduce Risks from

Illegal Pesticides by Effectively

identifying...Imports for Inspection

and Sampling

4) OECA will request each region to memorialize a functional protocol for how they will coordinate with local CBP offices on illegal pesticides being imported without NOAs. Regions will be asked to have their protocols in place by...

3/29/19

OCE

18-P-0059 Financial Assurance 1B) OECA, with support from OLEM, will conduct an analysis of the SF

program's use of corporate self-insurance instruments for current

settlements and orders at sites where the SF program follows the general framework of the RCRA regulation for financial assurance.

5 - 7)

Develop CERCLA SOPs that include:

- a) Roles and responsibilities for overseeing the validity of SF FA instruments;
- b) Procedures for checking w/other regions for facilities/sites w/multiple self-insured liabilities;
- c) Instructions on the steps to take when an invalid FA instrument (expired, insufficient in dollar amount, or not provided) is identified and
- d) Where and when to collect and document causes of invalid FA

03/31/19

03/31/19

OSRE

OSRE

18-P-0079 "...Better Manage State Pesticides Cooperative Agreements.."

Expand existing national review of state cooperative agreements to include an analysis of grantee performance as it relates to agency guidance/goals.

05/31/19

OC

18-P-0270 Protecting Children Health from Asbestos Exposure in Schools

OECA will develop compliance assistance material specifically focused on compliance with schools maintaining an asbestos management plan.

(40 CFR 763.93)

6/30/19

OC

Office of Enforcement and Compliance Assurance

Weekly Audit Report

October 25, 2018

11

Report # Report Title Corrective Action Due Date Office

18-P-0221 Flint Water Crisis 6) Reevaluate training needs

9) Initiate workgroups w/participation from OECA/OW and regions.

Develop procedures and strategies to ensure timely and effective EPA intervention.

9/30/19

9/30/19

OCE

OCE

18-P-0059 Financial Assurance 8) Train staff on the procedures and instructions developed for recs 5 - 7. 9/30/19

OSRE

18-P-0079 "...Better Manage State Pesticides

Cooperative Agreements.."

Combine Recommendations 1 & 2 Develop additional FIFRA guidance

to assist POs in evaluating whether funding is reasonable given projected work plan tasks.

11/30/19

OC

10-P-0224 CWA NPDES MOA • Using the tracking system, verify the MOAs identified during the

first four years round of integrated permitting and enforcement

reviews are updated.

09/30/2020 OCE

18-P-0059 Financial Assurance 9A2) Develop and distribute to EPA regions annual reports that include

the total dollar amount of SF FA required and provided

10) Annually track progress on the reduction of SF FA that, based on available data, is expired, insufficient in amount and/or not provided; and distribute to EPA regions as applicable.

12/31/19

12/31/19

OSRE

18-P-0059 Financial Assurance 2) Once recommendation 1 is complete, OLEM w/support from OECA,

will use the information to develop appropriate risk management actions to mitigate any identified problems in line w/Agency practices for enterprise risk management under OMB Circular A-123, and determine whether additional controls, such as a requirement for full disclosure of all self-insurance demonstration and/or disallowances of corporate selfinsurance, should be pursued at that time.

9/30/20 OSRE

18-P-0059 Financial Assurance 3) OLEM, w/support from OECA, will update SOPs and data systems to

accommodate the implemented risk management actions.

9/30/21 OSRE

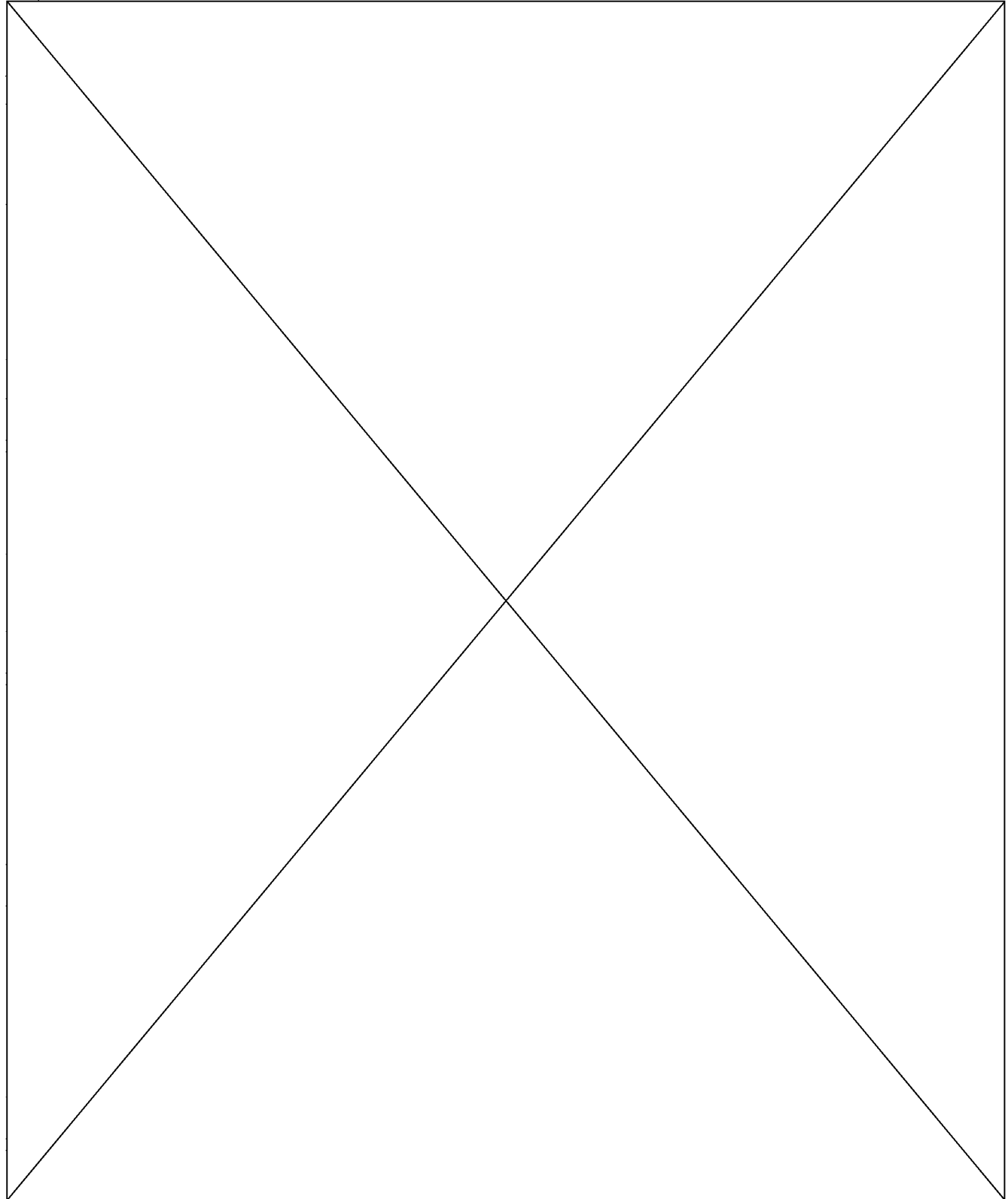
18-P-0050 Financial Assurance 4) OLEM, w/support from OECA, will train staff on the implemented

risk management actions.

12/31/21 OSRE

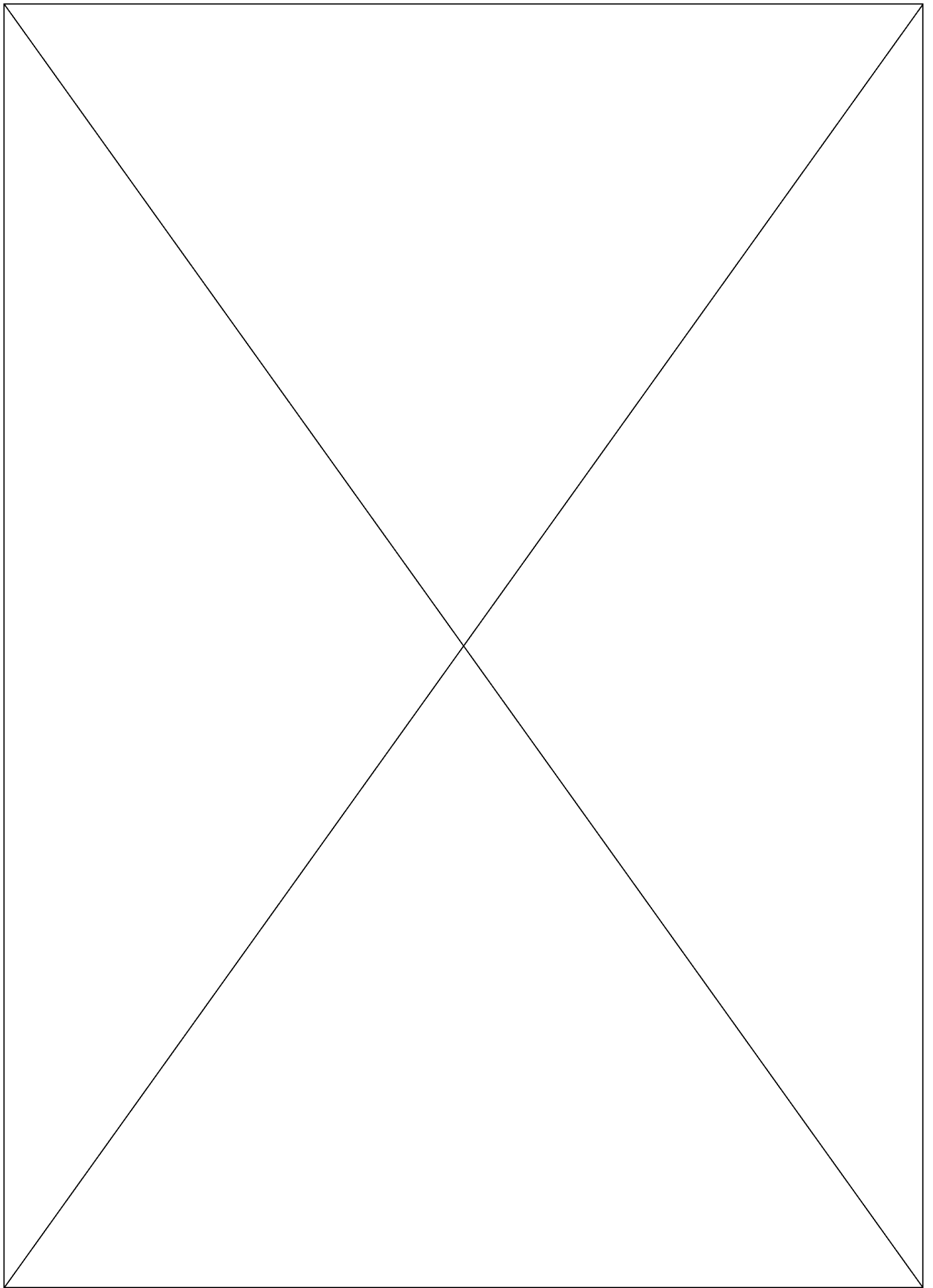
OECA, Internal Deliberative

Page 1 of 6



OECA, Internal Deliberative

Page 2 of 6



Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5